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July 27, 2020

Hon. Brian M. Cogan  
U.S. District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: United States of America v. Gregory Altieri

Dear Judge Cogan,

I am retained counsel to Defendant Gregory Altieri in the above-referenced case. Following the Court's email on July 23, 2020, the United States Attorney's Office ("USAO") and Defendant Gregory Altieri respectfully submit this joint status report in lieu of a remote status conference. This report addresses discovery-related matters and other matters the parties wish to inform the Court of.

**(1) PLEA NEGOTIATIONS**

Mr. Altieri and the USAO have begun to engage in plea negotiations to resolve his case without the need for a trial. There are lots of issues the parties must consider and discuss before arriving at a potential resolution, and we have begun a dialogue.

**(2) DISCOVERY**

The USAO has turned over to me an electronic copy of voluminous discovery, including Mr. Altieri's books and records, bank records and other financial documents. My review of this discovery has been made difficult by the pandemic, as my firm has been shut down since March 16, 2020. I am doing my best to work from my home office, and my staff is separately working from home. It has

also been a challenge to review discovery with Mr. Altieri under these circumstances. Nonetheless, we have been in constant contact and we are working diligently.

**(3) EXCLUSION OF TIME**

The parties agree that for the above-stated reasons, and mindful pandemic, time be excluded for a period of sixty (60) days from July 30, 2020.

**(4) CONCLUSION**

The undersigned for Mr. Altieri and the USAO have conferred by telephone to discuss the issues raised in, and the filing of, this joint status report.

Respectfully submitted,

/s/ Edward V. Sapone  
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